



ATTORNEYS AT LAW  
50 TICE BOULEVARD  
SUITE 250  
WOODCLIFF LAKE, NJ 07677

TELEPHONE 201-474-7100  
FACSIMILE 201-474-7101  
www.cmlawfirm.com

CALIFORNIA  
FLORIDA  
GEORGIA  
INDIANA  
NEW JERSEY  
NEW YORK  
PENNSYLVANIA  
WASHINGTON

WRITER'S DIRECT ACCESS  
201-474-7100  
tanderson@cmlawfirm.com

July 28, 2025

**VIA ECF**

Hon. Karen M. Williams, U.S.D.J.  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Courtroom 4A  
Camden, NJ 08101

**Re: S. Johnson v. New Jersey Transit Bus Operations, et al.**  
**Case No: 1:25-cv-02528 (KMW/EAP)**

Dear Judge Williams,

We represent New Jersey Transit Bus Operations, Inc. ("NJT") in the above-referenced matter. We are in receipt of Plaintiff's First Motion to Extend Time to File Response/Reply Opposition to Motion to Dismiss filed today (ECF No. 20). On June 2, 2025, Defendant NJT filed a pre-answer motion to dismiss based on the grounds that Plaintiff's Complaint fails to state a claim upon which relief can be granted and that this Court lacks subject matter jurisdiction to hear Plaintiff's claims (the "Motion") (ECF No. 13). Two weeks later, on June 16, Plaintiff sought a 30-day extension of time to file her opposition papers, to which Defendant NJT consented. Plaintiff never filed a formal request for an extension; however, the 30-day extension would have brought the deadline to file opposition papers to July 23, 2025. Plaintiff never contacted Counsel to request an extension for an additional 30-days beyond that date.

That being said, to save this Court the time and resources of hearing an additional motion, Defendant NJT consents to extend the deadline by which Plaintiff must file her opposition papers to August 22, 2025. This would place the deadline for Defendant NJT to file a reply brief to September 8, 2025, and the motion return date to September 15, 2025.

Respectfully submitted,

**CRUSER, MITCHELL, NOVITZ,  
SANCHEZ, GASTON & ZIMET, LLP**

/s/ Travis M. Anderson

Travis M. Anderson, Esq.